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January 17, 2023

By ECF and email

Hon. Nelson S. Roman United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

> Re: <u>United States v. Kassem Harris</u> 19 Cr 746 (NSR) and VOSR 14 Cr 645-03

Dear Judge Roman:

I write requesting that the Court adjourn the VOSR sentencing proceeding currently scheduled for Friday, January 20, 2023 at 1 p.m. for approximately 90 days.

I have conferred with AUSA Ryan Allison and the Government consents to this request.

Mr. Harris was re-arrested and that case is pending in the Southern District. The parties believe that it would make the most sense for the Court to adjourn the VOSR proceedings so that we can engage in plea discussions.

I will be unavailable from March 16-26 and I am starting a trial on March 28th. Accordingly, we request an adjournment of the VOSR sentencing proceeding to a date in mid to late April, 2023.

Deft's request to adjourn the in-person VOSR Admission/Sentencing from Jan. 20, 2023 until Apr. 19, 2023 at 9:45 am is GRANTED with the Govt's consent. Clerk of Court is requested to terminate both motions (19cr746 ECF No. 66 and 14cr645-03 ECF No. 95).

Dated: White Plains, NY January 19, 2023

SO ORDERED:

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Daniel S. Parker

Parker and Carmody, LLP

Respectfully submitted,

30 East 33rd Street

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New York, NY 10016

917-670-7622

HON. NELSON S. ROMAN

UNITED STATES DISTRICT JUDGE

Cc: AUSA Ryan Allison (by ECF and email)